

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

FUCHS LUBRICANTS CO., a Delaware )  
Corporation, )  
  )  
Plaintiff, )  
  )  
v. )                                   **Case No. 07 C 6140**  
  )  
NANCY HUDAk, an individual, )  
  )  
Defendant. )

**STIPULATION OF FACTS**

Defendant Nancy Hudak (“Hudak”), and Plaintiff Fuchs Lubricants Co. (“Fuchs”), by and through their respective counsel, hereby stipulate and agree to the following facts:

1. Hudak consents to the jurisdiction of this Court.
2. Fuchs manufactures, markets and sells industrial lubricants to a wide range of industries.
3. Hudak was employed by Fuchs as the Laboratory Director of Fuchs’ Northeast Division, and in that capacity Hudak had access to certain confidential and proprietary information regarding Fuchs’ business (including, but not limited to, the chemical formulations and blends for Fuchs’ products).
4. Hudak resigned from Fuchs on September 4, 2007. Prior to her resignation from Fuchs, Hudak accessed and copied certain confidential and proprietary information from Fuchs’ computer system, without Fuchs’ knowledge or authorization.
5. On October 1, 2007, Hudak began working for Hangsterfer’s Laboratories, Inc. (“Hangsterfer’s,” which is a direct competitor of Fuchs), where she held the position of “Chief Chemist.”

6. During the time period she was employed at Hangsterfer's, Hudak accessed, retrieved and referred to certain confidential and proprietary information that she had copied from Fuchs without Fuchs' knowledge or authorization.

Dated: May 13, 2008

**NANCY HUDA**

By: /s/ David B. Ritter  
One of Her Attorneys

David B. Ritter  
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**FUCHS LUBRICANTS CO.**

By: /s/ Daniel F. Lanciloti  
One of Its Attorneys

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